

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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RM-1141

In Re:

Kimberly J. English

Case No. 18-33147ABA

Judge:

Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO
CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

X TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(**choose one**):

1. ____ Motion for Relief from the Automatic Stay filed by ____,
creditor. A hearing has been scheduled for ____, at 10:00 a.m.

OR

____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has
been scheduled for ____ at ____ a.m.

OR

____ Certification of Default filed by ____, creditor. I am requesting
that a hearing be scheduled on this matter.

OR

X Certification of Default filed by Standing Chapter 13 Trustee.
I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other: I have not yet received the debtor's signed response. However, Ms. English advised me that she will cure the trustee payment arrears immediately. I respectfully request that the court deny the trustee's motion and permit Ms. English to continue and complete her bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 12/27/22

/s/Robert Manchel,
Robert Manchel, debtor's attorney